

U.S. Department of Justice



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Violent Crime Unit

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VIA ELECTRONIC SERVICE

Mr. Robert Taaffe, Jr.
1015 Locust, Suite 725
St. Louis, Missouri 63101

In re: **Notice of intent to introduce evidence pursuant to Rule 609**
United States v. Steve Williams
Cause No. S1-4:18 CR 697 HEA

Dear Counsel:

This letter serves as notice that the United States of America will use your felony convictions to cross-examine you pursuant to Federal Rule of Evidence 609 if you testify at trial. Specifically, the United States of America may introduce your following convictions during cross-examination:

- September 1, 2000, conviction in the St. Louis City Circuit Court, for two counts of Distributing Controlled Substance Near Schools, which occurred on or about January 3, 2000;
- April 3, 2003, conviction in the St. Louis City Circuit Court, for two counts of Possession of a Controlled Substance Except 35 Grams or Less of Marijuana, which occurred on or about September 29, 2002; and
- January 9, 2007, conviction in the Mississippi County Circuit Court-Charleston, Missouri, for Endangering a Person in Department of Corrections-Bodily Fluids, which occurred on or about January 3, 2006.

The United States' inquiry about these prior convictions will extend to, among other things, whether the conviction was obtained, when the conviction was obtained, and for what crime the conviction was obtained. *See United States v. Wesley*, 990 F.3d 360, 366 (8th Cir. 1993) (citations omitted); *United States v. Bogers*, 635 F.2d 749, 750 (8th Cir. 1980).

Please do not hesitate to contact me if you have any questions.

Very truly yours,

JEFFREY B. JENSEN
United States Attorney

/s/ Linda Lane

BY: LINDA R. LANE
Assistant United States Attorney

Encl.

cc: Clerk, United States District Court (w/out encl.)
Robert Taaffe, Attorney for Defendant